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JOEL KOHN
Interim Executive Director

Mr. Frazer Lockhart
Department of Energy/Rocky Flats Plant
Trailer 130A
P.O. Box 928
Golden, CO 80402

March 10, 1992

Dear Mr. Lockhart:

As you are aware, EPA and CDH have requested that DOE develop a site-wide ARARS document which will identify potential ARARS for all OUs. While this document is not a requirement of the IAG, the contents of the document may directly effect all site investigation studies and remedial/corrective action decisions that are made under the IAG. In fact, regulatory approval of a number of IAG RFI/RI workplans have been conditioned on satisfactory resolution of site wide ARARS document negotiations. We are concerned that this document has not been submitted as scheduled when we last met in December.

Both EPA and CDH find it unacceptable to allow the ARARS issue to remain unresolved. The longer we allow this issue to linger, the greater the likelihood that investigation and remedial activities will be adversely affected. Since Part 15 of the IAG provides that "EPA, after consultation with the State will determine the ARARS to be applied at the Rocky Flats Site", EPA and CDH intend to have a site-wide ARARS document prepared in the immediate future. If DOE does not submit the document, EPA and CDH will develop the document independent of DOE and will then evaluate all plans and actions in light of this document. Therefore, we propose that DOE, EPA and CDH meet on March 17, 1992, in EPA's Eagle Room at 3PM, to facilitate development of a site-wide ARARS document.

As discussed above, failure to resolve this issue in a timely manner may have broad implications on planned and ongoing IAG activities. Since many of the existing workplans were approved conditional upon resolution of the ARARS issues, and since DOE's ongoing field activities are intended to support remedy decisions consistent with ARARS, the ARARS issue must be resolved immediately. Otherwise, the workplan approvals are jeopardized and DOE risks wasting its resources gathering data which cannot be used to support remedy selection.

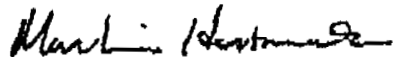
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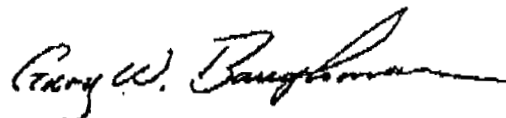
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Department of Energy.

Please contact Martin Hestmark at 294-1134 or Gary Baughman at 331-4847 to confirm the March 17 meeting or if you have any questions.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project
U.S. EPA



Gary Baughman, Unit Leader
Hazardous Waste Facilities
Colorado Department of Health

cc: Mr. Dan Miller, CO AGO
Mr. Rich Schassburger, DOE-RFP
Mr. Peter Ornstein, EPA
Ms. Barbara Barry, RFPU